

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KAYENAT FARAH, *et al.*,)
Plaintiffs,)
vs.)
EMIRATES, *et al.*,)
Defendants.)

Case No. 21-CV-5786 (LTS) (SN)

**SUGGESTION OF DEATH AS TO PLAINTIFF JOSEPH
CAMMARATA (Fed. R. Civ. P. 25)**

Counsel for Plaintiffs in the above-referenced action hereby gives notice, pursuant to Rule 25(a)(1) of the Federal Rules of Civil Procedure, of the death of Joseph Cammarata, a plaintiff in this action. Joseph Cammarata passed away on January 30, 2022. This notice is timely, pursuant to the Court's extension of deadlines as reflected in ECF Nos. 49 and 64.

Pursuant to Rule 25(a) of the Federal Rules of Civil Procedure, and within the deadline set forth in Rule 25(a), Plaintiffs intend to seek to substitute Sarah Cammarata for Mr. Cammarata, as successor in interest to Mr. Cammarata, with respect to his individual retaliation claims (i.e. the Eleventh and Twelfth Causes of Action). In addition, Plaintiffs intend to seek to amend the complaint to add Monique Tackling as a named plaintiff and proposed class representative in this action with respect to the ERISA and the New York WARN Act claims (i.e. the First through Fourth Causes of Action). Plaintiffs' counsel are in discussions with Counsel for Defendants about the possibility of a stipulation to the aforementioned substitution/addition of parties and to the filing of a Second Amended Complaint. If the parties are unable to reach an agreement on a stipulation, Plaintiffs intend to move for the aforementioned through motion practice. In either scenario, Plaintiffs will either file a joint stipulation regarding the above, or a motion seeking the above, in compliance with the Court's Civil Case Management Plan & Scheduling Order, which permits the parties to move to amend the pleadings or join additional parties until July 1, 2024.

This the 31st day of May, 2024.

By: Isl Evan Brustein

Evan Brustein
Brustein Law PLLC
299 Broadway, 17th Floor
New York, New York 10007
(212) 233-3900
evan@brusteinlaw.com

Maya Risman
Risman & Risman P. C.
299 Broadway, 17th Floor
New York, New York 10007
(212) 233-6400
mrisman@risman-law.com

Kirsten Scott
Teresa Renaker
Renaker Scott LLP
505 Montgomery Street, Suite 1125
San Francisco, CA 94111
kirsten@renakerscott.com
teresa@renakerscott.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on May 31, 2024, I served the foregoing to the following:

Evan Citron, Esq.
Jackson Lewis P. C.
666 Third Avenue
29th Floor
New York, New York 10017
(212) 545-4069
Evan.citron@jacksonlewis.com
Attorneys for Defendants

By: *Isl* Evan Brustein
Evan Brustein